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May 16, 2008

Ms. Andrea Needles  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: C00295527  
Reply to your April 16, 2008 correspondence

Dear Ms. Needles:

I write in reply to your letter dated April 16, 2008 to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding the Amended February 2008 Report that was filed on March 20, 2008. More specifically, you request "clarifying information" as to why \$12,890 in operating expenditures reported on the amended report were not disclosed on the original report.

The expenditures to which you refer represent a pair of disbursements for fund-raising fees paid to InfoCision Management Corporation ("InfoCision") on January 25, 2008. One check was for \$2,195.33 and the other was for \$10,694.60. On the date in question, a total of five checks were written to InfoCision in the amounts of \$1,130.62, \$1,198.83, \$2,195.33, \$10,694.60 and \$16,428.98.<sup>1</sup>

InfoCision is a full service telemarketing firm based in Akron, Ohio. As part of their fee-based fund-raising services, InfoCision also provides certain administrative services, including, among other things, the maintenance of the CU-PVF bank account with JPMorgan/Chase Bank. CU-PVF's account representative at InfoCision writes the checks that are to be drawn on this account and submits them to the Citizens United offices for review and signature, usually via UPS overnight delivery. Once signed, checks written to

<sup>1</sup> The check in the amount of \$16,438.98 was not reported on the Initial February 2008 Report or the Amended February 2008 Report, but has been reported on a Second Amended February 2008 Report, which was filed on April 18, 2008.

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